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*Attorneys for Aida and Ramiro Rodriguez*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:  
PG&E CORPORATION, et al.  
Debtors.

Case No. 19-30088  
Chapter 11

In re:  
PACIFIC GAS & ELECTRIC COMPANY, et al.  
Debtors.

Case No. 19-30089  
Chapter 11

**NOTICE OF APPEARANCE AND  
REQUEST FOR SPECIAL NOTICE  
BY AIDA AND RAMIRO  
RODRIGUEZ**

1           **PLEASE TAKE NOTICE** that Aida and Ramiro Rodriguez (“the Rodriguezes”) hereby  
2 request, pursuant to Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy  
3 Procedure, or pursuant to any other applicable rule or statute, that notice of all matters which may  
4 come before the Court be given to the Rodriguezes’ counsel of record:

5           GROSS & KLEIN LLP  
6           Stuart G. Gross  
7           The Embarcadero  
8           Pier 9, Suite 100  
9           San Francisco, CA 94111  
10          Telephone: (415) 671-4628  
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12          E-mail: sgross@grosskleinlaw.com

13           The foregoing request includes, without limitation all notices, papers, and disclosure  
14 statements referred to in Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy  
15 Procedure, and also includes notice of any orders, applications, complaints, demands, hearings,  
16 motions, petitions, pleadings or requests, and any other documents brought before the Court in  
17 this case, as well as anything concerning which the Rodriguezes may be heard under Section  
18 1109 of the Bankruptcy Code, whether formal or informal, whether written or oral, and whether  
19 transmitted or conveyed by electronic mail, mail, hand delivery, telephone, telegraph, facsimile,  
20 or otherwise.

21           This notice of appearance and request for special notice, as well as any subsequent  
22 appearance, pleading, claim or suit, are without prejudice to and do not waive and expressly  
23 reserves: (1) the Rodriguezes’ rights, remedies, claims, actions, defenses, setoffs, or recoupments,  
24 in law or in equity, against the above-captioned debtor and any other person either in this case or  
25 in any other action; (2) any objection which may be made to the jurisdiction of the Court; (3) the  
26 Rodriguezes’ right to have final orders in non-core matters entered only after de novo review by a  
27 district judge; (4) the Rodriguezes’ right to trial by jury in any proceedings or trial, in any state of  
28 federal court, so triable herein or in any case, controversy or proceeding relating hereto; and (5)  
the Rodriguezes’ right to have and reference withdrawn in any matter subject to mandatory or  
discretionary withdrawal. This notice of appearance and request for special notice, as well as any  
subsequent appearance, pleading, claim or suit, are not, shall not be deemed or construed as, a

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE; Case Nos. 19-30088, 19-30089

1 submission of the Rodriguezes to the jurisdiction of the Court concerning any claim or the waiver  
2 of any rights of the Rodriguezes to pursue any claims against any person in any other forum, state  
3 of federal, including without limitation, the jurisdiction of the Court to adjudicate non-core  
4 matters, all of which rights are reserved without prejudice.

5  
6 Dated: February 13, 2019

GROSS & KLEIN LLP

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8 By: /s/ Stuart G. Gross

STUART G. GROSS

9 *Attorneys for Aida and Ramiro Rodriguez*  
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